# **EXHIBIT 14**

# MAO DECLARATION OPPOSITION TO MOTION TO STRIKE

## Ryan Sila

From: Flórez, Argemira <AFlorez@willkie.com>
Sent: Friday, December 27, 2024 2:08 PM

**To:** Ryan Sila; Mateen, Harris; waagoogleteam@simplelists.susmangodfrey.com; Mark C. Mao; M. Logan

Wright; Alex Frawley; Ryan McGee x3030

**Cc:** FIREBASE-WFGE

**Subject:** RE: Rodriguez v. Google

#### **EXTERNAL Email**

Ryan,

This delay will not be used to argue against Plaintiffs. We requested the financial data that we agreed to supplement soon after our meet and confer call at the end of October.

We received an incorrect set of data from the Google finance and accounting team and had to ask them to rerun it. The YTD numbers you requested aren't kept by Google for AdMob so they have to run a custom report, which caused some additional unexpected delay. I can assure you none of this is by design.

We are still working with Google's finance teams on producing the data. We have been in contact with them several times over the last several weeks and they told us this week (during the holidays) that they could not meet the close of month deadline, but they can get it done by the second week of January, after which we will immediately get it produced to you.

We are working as quickly as we can and will provide a concrete date for production when we have one.

Thank you, Argemira

Argemira Flórez Willkie Farr & Gallagher LLP

333 Bush St | San Francisco, CA 94104

Direct: <u>+1 415 858 7407</u> | Fax: +1 415 858 7599 <u>aflorez@willkie.com | vCard | www.willkie.com bio</u>

**From:** Ryan Sila <RSila@susmangodfrey.com> **Sent:** Thursday, December 26, 2024 4:38 PM

To: Flórez, Argemira <AFlorez@willkie.com>; Mateen, Harris <HMateen@willkie.com>;

waagoogleteam@simplelists.susmangodfrey.com; Mark C. Mao <mmao@bsfllp.com>; M. Logan Wright

<MWright@BSFLLP.com>; Alex Frawley <AFrawley@susmangodfrey.com>; Ryan McGee x3030

<rmcgee@forthepeople.com>

Cc: FIREBASE-WFGE <FIREBASE-WFGE@willkie.com>

Subject: RE: Rodriguez v. Google

\*\*\* EXTERNAL EMAIL \*\*\*

Counsel —

Google should be able to produce this data now. It has been three months since Q3 ended, and Google agreed to produce this information even before that. Google previously represented that it typically takes only a couple of weeks after the close of a quarter to prepare financial data. When we reminded Google of this outstanding production on November 22, Google did not respond. When we asked Google again on December 2, Google responded that it would produce this data in December. If the holidays now make that difficult, that is a problem of Google's own making.

Plaintiffs are concerned that Google obstructed the finalization of Lasinski's supplemental report in order to manufacture a meritless argument of prejudice. Has counsel yet asked Google to pull the Q3 financial data? If so, when did counsel ask? And why hasn't Google yet satisfied counsel's request?

Thanks, Ryan

From: Flórez, Argemira < AFlorez@willkie.com > Sent: Monday, December 23, 2024 8:30 PM

**To:** Ryan Sila <<u>RSila@susmangodfrey.com</u>>; Mateen, Harris <<u>HMateen@willkie.com</u>>; waagoogleteam@simplelists.susmangodfrey.com; Mark C. Mao <<u>mmao@bsfllp.com</u>>; M. Logan Wright <<u>MWright@BSFLLP.com</u>>; Alex Frawley <<u>AFrawley@susmangodfrey.com</u>>; Ryan McGee x3030

<rmcgee@forthepeople.com>

Cc: FIREBASE-WFGE < FIREBASE-WFGE@willkie.com >

Subject: RE: Rodriguez v. Google

#### **EXTERNAL Email**

Hi Ryan,

Given the holiday, we're aiming for no later than the second week in January.

Thanks, Argemira

#### Argemira Flórez Willkie Farr & Gallagher LLP

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From: Ryan Sila < RSila@susmangodfrey.com > Sent: Sunday, December 22, 2024 7:55 AM

**To:** Flórez, Argemira <<u>AFlorez@willkie.com</u>>; Mateen, Harris <<u>HMateen@willkie.com</u>>; waagoogleteam@simplelists.susmangodfrey.com; Mark C. Mao <<u>mmao@bsfllp.com</u>>; M. Logan Wright <<u>MWright@BSFLLP.com</u>>; Alex Frawley <<u>AFrawley@susmangodfrey.com</u>>; Ryan McGee x3030

<rmcgee@forthepeople.com>

Cc: FIREBASE-WFGE <FIREBASE-WFGE@willkie.com>

Subject: RE: Rodriguez v. Google

#### \*\*\* EXTERNAL EMAIL \*\*\*

Counsel — Following up on this. When will Google produce the Q3 financial data?

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From: Ryan Sila

Sent: Tuesday, December 3, 2024 9:05 AM

To: Flórez, Argemira <AFlorez@willkie.com>; Mateen, Harris <HMateen@willkie.com>;

waagoogleteam@simplelists.susmangodfrey.com; Mark C. Mao <mmao@bsfllp.com>; M. Logan Wright

<MWright@BSFLLP.com>; Alex Frawley <afrawley@susmangodfrey.com>; Ryan McGee x3030

<rmcgee@forthepeople.com>

Cc: FIREBASE-WFGE <FIREBASE-WFGE@willkie.com>

Subject: RE: Rodriguez v. Google

Thanks, Argemira. As you know, we have been seeking this data from Google so that we can finalize and serve the supplemental Lasinski report. We would like to do that as soon as possible, and this seems to be the only hold up. Our understanding is that it should have taken only a couple weeks after the conclusion of the quarter to compile. If you can follow up with Google so that this data can be produced as soon as possible, we would appreciate it. Please keep us posted.

Best, Ryan

From: Flórez, Argemira < AFlorez@willkie.com > Sent: Monday, December 2, 2024 4:12 PM

To: Ryan Sila <<u>RSila@susmangodfrey.com</u>>; Mateen, Harris <<u>HMateen@willkie.com</u>>;

<u>waagoogleteam@simplelists.susmangodfrey.com</u>; Mark C. Mao <<u>mmao@bsfllp.com</u>>; M. Logan Wright <<u>MWright@BSFLLP.com</u>>; Alex Frawley <<u>AFrawley@susmangodfrey.com</u>>; Ryan McGee x3030

<rmcgee@forthepeople.com>

Cc: FIREBASE-WFGE <FIREBASE-WFGE@willkie.com>

Subject: RE: Rodriguez v. Google

## **EXTERNAL Email**

Hi Ryan,

We are working on this and intend to complete our data pull this month.

Best, Argemira

## Argemira Flórez Willkie Farr & Gallagher LLP

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From: Ryan Sila < RSila@susmangodfrey.com > Sent: Monday, December 2, 2024 11:05 AM

To: Mateen, Harris < HMateen@willkie.com >; waagoogleteam@simplelists.susmangodfrey.com; Mark C. Mao

<mmao@bsfllp.com>; M. Logan Wright <MWright@BSFLLP.com>; Alex Frawley <AFrawley@susmangodfrey.com>; Ryan

McGee x3030 < rmcgee@forthepeople.com >

Cc: FIREBASE-WFGE <FIREBASE-WFGE@willkie.com>

Subject: RE: Rodriguez v. Google

\*\*\* EXTERNAL EMAIL \*\*\*

Case 3:20-cv-04688-RS Document 453-15 Filed 01/16/25 Page 5 of 6

Counsel — Following up on this. Please confirm that Google will send financial figures updated through Q3 2024 and let us know when it expects to do so.

From: Ryan Sila

Sent: Monday, November 18, 2024 2:33 PM

**To:** Mateen, Harris < <a href="mailto:HMateen@willkie.com">HMateen@willkie.com</a>; <a href="mailto:waagoogleteam@simplelists.susmangodfrey.com">waagoogleteam@simplelists.susmangodfrey.com</a>; <a href="mailto:Mateen@willkie.com">Mark C. Mao</a>

<mmao@bsfllp.com>; M. Logan Wright <MWright@BSFLLP.com>; Alex Frawley @susmangodfrey.com>; Ryan

McGee x3030 <rmcgee@forthepeople.com>

Cc: FIREBASE-WFGE <FIREBASE-WFGE@willkie.com>

Subject: RE: Rodriguez v. Google

Thank you. We have been reviewing and we'll let you know ASAP if we have any follow-up questions.

When does Google anticipate producing financial figures supplemented to run through the end of the class period?

From: Mateen, Harris (via waagoogleteam list) < waagoogleteam@simplelists.susmangodfrey.com>

Sent: Saturday, November 9, 2024 4:29 PM

To: waagoogleteam@simplelists.susmangodfrey.com; Mark C. Mao <mmao@bsfllp.com>; M. Logan Wright

<MWright@BSFLLP.com>; Ryan Sila <RSila@susmangodfrey.com>; Alex Frawley <AFrawley@susmangodfrey.com>; Ryan

McGee x3030 < rmcgee@forthepeople.com >

Cc: FIREBASE-WFGE <FIREBASE-WFGE@willkie.com>

Subject: Rodriguez v. Google

### **EXTERNAL Email**

Counsel -

Please see attached correspondence.

Sincerely,

# Harris Mateen Willkie Farr & Gallagher LLP

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